

**Federal Defenders
OF NEW YORK, INC.**

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January 19, 2023

BY ECF

Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Natanael Pellot*, 21 Cr. 187 (LTS)

Dear Chief Judge Swain:

I write on behalf of Natanael Pellot to respectfully request a modification of his bail conditions, striking the requirement of a curfew with location monitoring. In the alternative, I respectfully request a temporary suspension of his curfew condition to facilitate his travel to the Southern District of New York next week. Neither Pretrial Services nor the Government objects to either request.

Mr. Pellot has been on pretrial release for more than a year. He was initially released with the requirement of home detention enforced by electronic monitoring. ECF No. 22. After three months, on March 21, 2022, the Court agreed to modify that condition to a curfew. ECF No. 26. According to the officer supervising Mr. Pellot in the Middle District of North Carolina, he has been fully compliant with the conditions of his release from day one. He has a full-time job and keeps in excellent communication with the Probation department.

Mr. Pellot has demonstrated that a curfew and electronic monitoring are not necessary to secure his reappearance in court or to safeguard the community. Even aside from his track record on pretrial supervision over the last year, Mr. Pellot is an Army veteran with no prior criminal history. Accordingly, we ask that the requirement of a curfew with electronic monitoring be stricken from his bail conditions. I have spoken with Pretrial Services in the SDNY and Probation in the Middle District of North Carolina. Neither department objects to this modification. The Government defers to Pretrial Services.

In the alternative, I respectfully request permission for Mr. Pellot to travel from North Carolina to New York next week—Wednesday, January 25, 2023 through

Friday, January 27, 2023—to attend to a matter concerning his personal finances and to meet with counsel in this case. Although Mr. Pellot’s original bond permits travel to the SDNY, his supervising officer suggested that Court approval would be required for this trip due to the necessity of suspending his curfew condition while he is away. Neither Pretrial Services nor the Government objects to this request.

Thank you for your consideration of these requests.

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner

Assistant Federal Defender

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cc: Elizabeth Espinosa, Assistant U.S. Attorney (By ECF and Email)
Pretrial Services (By Email)

Application granted. The curfew with location monitoring requirement is hereby stricken from the defendant’s bail conditions.

SO ORDERED.

January 20, 2023



Laura Taylor Swain, Chief USDJ